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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC,

Defendants,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Nominal Defendant.

**DECLARATION OF STEVEN WATERS
IN SUPPORT OF OPPOSITION TO
MOTION TO FREEZE ASSETS**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielsen

Magistrate Judge Daphne A. Oberg

1. I, Steven Waters, am over the age of 18 and make this declaration based on my own personal knowledge unless otherwise expressly stated. If called, I could and would competently testify thereto.

2. Between early 2019 and late 2020, I provided creative and marketing services for Blockchain Game Partners (“BGP” or the “Company”), d/b/a Gala Games. In my work, I was responsible for marketing Green, Connect, and Arcade/GALA—all blockchain related projects. During my time with BGP, there was never a discussion about the creation of a Company treasury. There was no Company treasury created.

3. In early 2019, Schiermeyer flew to Utah to meet with our team and learn more about our blockchain technology. Schiermeyer, having never developed blockchain technology, was intrigued with the technology we developed for the proof of power protocol for the Green blockchain project. He also was interested in the proof of action protocol we utilized with Connect.

4. On or about June 18, 2019, I interacted with Jason Brink when he bought Arcade nodes from BGP as a customer. He did not begin work with BGP until September 2020.

5. Brink did not participate in the early discussions about, and development of, the distribution and node infrastructure which powered the BGP ecosystem.

6. Based on my interactions with Travis Allen, he was contracted to work with our team after completion of a development “bootcamp”. To my recollection, had no prior employment experience working as a developer and had no experience developing blockchain applications. Allen only worked on forked copies of the Green blockchain and the Connect code.

I declare, under penalty of perjury under the laws of the state of Utah of the United States of America, that the foregoing is true and accurate.

DATED: September 11, 2023

/s/ Steven Waters
Steven Waters

CERTIFICATE OF SERVICE

I hereby certify that on 11 September 2023, a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby served on counsel of record.

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/s/ Lindsey A. Wharton